REMARKS/ARGUMENTS

The rejections presented in the Office Action dated May 12, 2009 (hereinafter Office Action) have been considered. Claims 1, 2, 4, 5, 8-17 and 19-35 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

1. Claims 1-2, 4-5, 8-17, 19-24 and 26-35 are rejected based on 35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. 2004/0201448 by Wang (hereinafter "Wang") in view of U.S. Publication No. 2004/0018839 by Andric et al. (hereinafter "Andric") and further in view of U.S. Publication No. 2002/0068570 by Abrol et al. (hereinafter "Abrol").

Applicants respectfully traverse the rejections. The combination of Wang, Andric, and Abrol fails to correspond to the claimed invention. For example, independent Claim 1 sets forth that association ID data includes a master ID exclusively identifying a controller relative to any other controller within communication range of a wireless node. The association ID also includes a network ID corresponding to a network served by the controller and of which the wireless node is operating, and a slave ID exclusively assigned to the wireless node relative to any other wireless nodes in the network. The association ID data is selected from a numerical range exclusively allocated to the controller. The association ID data is assigned to the wireless node, and the controller determines that association IDs of incoming wireless signals are within the numerical range, and in response thereto, uses the stored association ID data to identify the incoming wireless signals as coming from the wireless node. Independent Claims 17, 23, 29, and 30 recite similar features related to association ID data.

The combination of Wang, Andric, and Abrol fails to teach or suggest an association ID including all of master, network, and slave IDs that is selected from an exclusively assigned numerical range. In the rejection of Claim 1, paragraph 0189 of Adric is relied upon as teaching an association ID data selected from a numerical range. However, Andric is not relied upon as teaching an association ID that includes master, network, and slave IDs. Instead, Wang and Abrol are relied upon to individually teach the use of such

identifiers. Applicants assert that, when viewed in the entire context of both of these references, one of ordinary skill in the art would not arrive at the claimed invention by combining the asserted features of Wang, Andric, and Abrol. Instead, the rejections rely on a hindsight combination that is motivated only by the Applicants' own teachings.

The Wang reference is first discussed. Wang describes initializing a component that involves "assigning a unique network ID code to the component when it joins the network." (Wang, 0031). In particular, a remote control R is a first component permitted by a master device of an LCM to join a LAN, to which the LCM "allocates and transmits a unique ID code for the requesting remote." (Wang, 0032-0034).

Wang fails to describe that the unique ID code comprises a network ID corresponding to a network served by the controller. In recognizing this deficiency, the Office Action (at page 4) relies on Andric at 0189-0190 as purportedly teaching a network ID. However, the term "network identifiers" as used in Andric at 0189-0190 are clearly identifiers associated only with the mobile nodes (MN) and do not expressly correspond to a network served by a particular controller. For example, "it is not practicable to have MNs obtain new logical network identifiers as they move throughout the network. MNs instead have a 'static' address to identify them." (Andric, 0189). Thus Andric fails to teach or suggest an association ID that comprises a network ID corresponding to a network served by a controller.

The rejections further rely on Adric to teach selecting an association ID data from a numerical range exclusively allocated to the controller. However, the cited portions of Andric merely state that in "assigning a network static address, the control node may chose from a pool of addresses set aside in the network for MNs." This fails to expressly or inherently describe an association ID that includes both a network ID and a slave ID, and that is selected from a numerical range exclusively allocated to the controller. At most, Andric describes allocating only a static address for an MN that is unique ***within*** a network, but nowhere does the combination of Wang or Andric teach using an association ID that directly corresponds to a network, e.g., by including a network ID in the association ID.

The combination of Wang and Andric is further deficient in determining that association IDs of incoming wireless signals are within the numerical range. As already recognized in the Office Action, Wang is silent on the use of any numerical ranges. Andric merely describes using a pool of address to assign a static address to a MN that is unique within a network, but Andric fails to teach or suggest any determination of ranges of incoming wireless signals. On the contrary, after the initial assignment of the static address, Andric does not describe any further association between a control node of the network and an MN. Andric is directed to a self-organizing network "characterized by a plurality of nodes in communication with at least one control node, charged with controlling one or more of the formation, maintenance and message routing between nodes of the network." (Andric, 0075). In such a loosely coupled network, the control node "assigns a unique node ID to each member node," but the network is otherwise "self-organized, and supports network redundancy to attain a degree of fault resistance and self-repair." (Andric, 0081-0082).

Thus, the combination of Wang and Andric fail to describe both selecting and determining an association ID within a numerical range exclusively allocated to a controller, wherein the association ID includes both a network ID and a slave ID. The Office Action recognizes on page 4 that the combination of Wang and Andric further fails to expressly describe that the unique ID code comprises a master ID exclusively identifying a controller. Both Wang and Andric merely describe assigning a code unique to a component when the component joins a network, and so Abrol is relied upon to teach the use of a master ID that exclusively identifies the controller. However, Abrol only states that an "MS was assigned an IP address from a pool of addresses belonging exclusively to the PDSN." (Abrol, 0009). Like Andric, Abrol is describing the assignment of an address ***to*** an MS. While not acquiescing that the PDSN of Abrol can be properly characterized as a "controller" as set forth in the claims, the assignment of addresses ***from*** the pool ***to*** an MS clearly indicates that the assigned address does not uniquely identifies the PSDN, nor is there any intention that the address be used for this purpose.

When the combination of Wang, Andric, and Abrol are viewed in the context of their respective teachings, there is a clear failing of these references to teach or suggest all of the limitations of Claims 1, 17, 23, 29, and 30. The combination of references therefore fails to provide sufficient guidance for one of ordinary skill in the art having these references before him/her to make the combination or modification suggested by the Examiner. As recently stated in *KSR v. Teleflex* decision,

> Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does. This is so because inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known. *KSR Int'l. Co. v. Teleflex Inc.* 550 U.S. 398,. 1727, 1741 (2007).

Not only does the cited combination of references fail to teach the specific composition and use of the claimed association ID described above, the combination of the teachings of Wang, Andric, and Abrol "according to their established functions" fails to suggest any association ID data that is both unique to a controller and network, where such association ID is selected and determined within a numerical range exclusively allocated to the controller. Instead, the rejections rely on narrowly described features in the respective references, and thus evidence an improper reliance on hindsight: taking Applicants' disclosure as a blueprint for piecing together disparate teachings of the prior art to defeat patentability. Accordingly, *prima facie* obviousness has not been established, and the Applicants respectfully submit that independent Claims 1, 17, 23, 29, and 30 are allowable over the Wang/Andric/Abrol combination.

Claims 2, 4-5, 8-16, 19-22, 24, 26-28, and 31-35 depend respectively from Claims 1, 17, 23 and 30. While Applicants do not acquiesce with the particular rejections to these dependent claims, including any assertions concerning inherency or the taking of Official Notice, these rejections are now moot in view of the remarks made in connection with independent Claims 1, 17, 23 and 30. "If an independent claim is nonobvious under 35 U.S.C. §103, then any claim depending therefrom is nonobvious." M.P.E.P. §2143.03; citing *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

2. Claim 25 is rejected based on 35 U.S.C. §103(a) as being unpatentable over Wang in view of Andric, Abrol and further in view of U.S. Patent No. 6,349,883 to Simmons et al. (hereinafter "Simmons").

Applicants respectfully traverse the rejections. Without acquiescing to the particular reasons for the rejection, Claim 25 is allowable over the Wang/Andric/Abrol/Simmons combination at least because of the arguments made above regarding Claim 23 from which Claim 25 depends. Simmons was not relied upon to cure the deficiencies of Wang/Andric/Abrol as applied to Claim 23, nor does Simmons provide such a remedy. Accordingly, Claim 25 is also allowable over the cited combination of references.

Authorization is given to charge Deposit Account No. 50-3581 (HONY.015PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the Examiner is invited to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

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